

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
(PITTSBURGH)**

IN RE:

Scott A. Marx

Debtor(s).

CHAPTER 7

CASE NO.: 19-21621-GLT

**NOTICE OF ENTRY OF APPEARANCE  
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that Planet Home Lending LLC as servicer for Wilmington Trust, National Association, not in its individual capacity, but solely as trustee for MFRA Trust 2015-1 ("Wilmington"), secured creditor to the above entitled Debtors by and through its undersigned counsel, hereby enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3007 and 9007 and Section 342 of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned case be given and served upon the undersigned at the following addresses and telephone/facsimile numbers:

Kaitlin D. Shire, Esq.  
Hill Wallack LLP  
1000 Floral Vale Blvd., Suite 300  
Yardley, PA 19067  
Telephone: (267) 794-6113  
Facsimile: (215) 579-9248  
Email: [kshire@hillwallack.com](mailto:kshire@hillwallack.com)

PLEASE TAKE FURTHER NOTICE that neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive

Wilmington Trust, National Association, not in its individual capacity, but solely as trustee for MFRA Trust 2015-1 (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Wilmington Trust, National Association, not in its individual capacity, but solely as trustee for MFRA Trust 2015-1 is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: March 7, 2024

Hill Wallack LLP

By: /s/ Kaitlin D. Shire

Kaitlin D. Shire, Esq.

Hill Wallack LLP

1000 Floral Vale Blvd., Suite 300

Yardley, PA 19067

Telephone: (267) 794-6113

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Counsel to Planet Home Lending LLC as servicer  
for Wilmington Trust, National Association, not in  
its individual capacity, but solely as trustee for  
MFRA Trust 2015-1

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**CERTIFICATE OF SERVICE**

I hereby certify that service was made upon all interested parties, indicated below of (i) Notice of Appearance of Planet Home Lending LLC as servicer for Wilmington Trust, National Association, not in its individual capacity, but solely as trustee for MFRA Trust 2015-1 in the manner indicated below on March 7, 2024:

Scott A. Marx  
711 Gallion Avenue  
Pittsburgh, PA 15226

**Debtor**

**Via Regular Mail**

Bryan P. Keenan  
993 Greentree Road  
Suite 200  
Pittsburgh, PA 15220

**Counsel for Debtor**

**Via ECF**

Office of the U.S. Trustee  
1000 Liberty Avenue  
Suite 1316  
Pittsburgh, PA 15222  
**United States Trustee**  
**Via ECF**

Rosemary C. Crawford  
Crawford McDonald, LLC.  
P.O. Box 355  
Allison Park, PA 15101  
**Chapter 13 Trustee**  
**Via ECF**

By: /s/ Katilin D. Shire  
Kaitlin D. Shire, Esq.,  
Attorney ID 324226  
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